

United States District Court in the Eastern District of  
Michigan, Southern Division

-----X  
PAUL GOODMAN AND LINDA GOODMAN,  
Plaintiff,

-against-

Case No. 2:14-cv-11473-  
AJT-RSW

DILLON TRANSPORTATION, LLC, a Tennessee limited  
liability company,

**AFFIDAVIT OF  
PLAINTIFF'S EXPERT**

Defendants.

-----X  
STATE OF NEW JERSEY )  
ss.:  
COUNTY OF WARREN )


SCOTT L. TURNER, being duly sworn, deposes and says:

1. As a supplemental to my Draft Report (Draft submitted by Counsel), I render this Affidavit to further opine on the subject commercial motor vehicle incident that caused injury to the Plaintiff(s).
2. As the Commercial Motor Vehicle Expert retained by Plaintiff in evaluating the Commercial Motor Vehicle incident that occurred on Thursday, April 26, 2012 at approximately 10:30AM, and the incorporation of the Deposition Transcript of Miguel Urjiles of April 15, 2015, said testimony further substantiates my opinions:

*Q: "And it's your testimony that the sound of that kind of last gasp of air coming out is what tells you that the legs have come down?" A: "Yes, sir." Q: "And once those legs come down and that air gets out you're basically good to go that last foot to back the trailer up?" A: "Repeat it again." Q: "Sure. I'm just trying to get the process. I've seen it. I've heard you describe it. I just want to make sure I get it. Once you hear that sound, that last kind of "pssh" of air, that sound you told me..." A: "Uh-huh" Q: "... that tells you that the legs have come down; correct?" A: "No, that tells me that the legs were already locked." Q: "The legs are locked?" A: "Yes, sir." (MU: 28/19)*

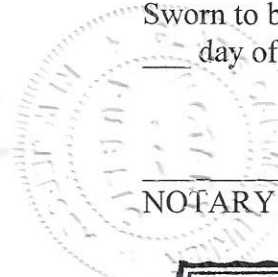
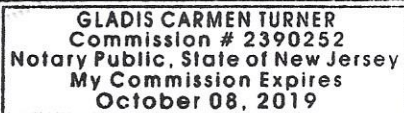
3. The testimony offered by Miguel Urjiles causes for my opinions to be further substantiated whereas Mr. Urjiles used an audible to determine that the semi-trailer's Maxi-Lok assembly was properly secured before allowing dock workers to enter the semi-trailer.

4. Beyond the above additional opinion, there are no additional opinions as a result of the review of the deposition transcript of Miguel Urjiles. Further, all of my prior opinions authored in my Draft Report are unchanged.

  
\_\_\_\_\_  
SCOTT L. TURNER

Sworn to before me before this *5th*  
day of May, 2016

  
\_\_\_\_\_  
NOTARY PUBLIC

  
  
GLADIS CARMEN TURNER  
Commission # 2390252  
Notary Public, State of New Jersey  
My Commission Expires  
October 08, 2019